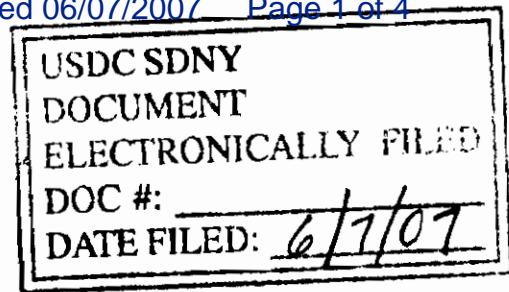


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



BRICKMAN INVESTMENTS INC., On  
Behalf of Itself and All Others Similarly  
Situating,

Plaintiff,

vs.

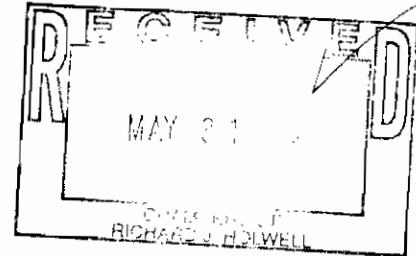
ALLOT COMMUNICATIONS LTD., et al.,

Defendants.

Civil Action No. 07-cv-03455-RJH

CLASS ACTION

**STIPULATION AND [PROPOSED]  
ORDER**



WHEREAS, on May 1, 2007, plaintiff, Brickman Investments Inc. filed a complaint captioned *Brickman Investments Inc. v. Allot Communications Ltd., et al*, a putative class action, which was assigned to the Honorable Richard J. Holwell and an answer has not been filed in this action or any related action;

WHEREAS, the parties believe that, for reasons of judicial efficiency and economy, defendants should be permitted to withhold responding to this action or any related action until after the actions are consolidated and lead plaintiff and lead counsel are appointed and a consolidated complaint is filed;

WHEREAS, counsel for Allot Communications Ltd. ("Allot" or the "Company" or "Defendant") agrees to accept service on behalf of the Company.

WHEREFORE, the parties, by and through their undersigned counsel, hereby stipulate that the Court be requested to enter an order as follows:

1. Defendant need not answer, move against or otherwise respond to this action or any related action until a consolidated complaint is filed;

2. Lead plaintiff shall serve a consolidated complaint ("Consolidated Complaint") within 60 days of entry of the Court's Order appointing lead plaintiff(s) and designating lead counsel;

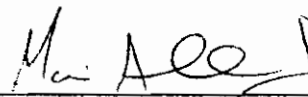
3. Defendant shall answer, move against or otherwise respond to the Consolidated Complaint 60 days after service of the Consolidated Complaint; and

4. If Defendant moves to dismiss the Consolidated Complaint, the lead plaintiff shall serve an opposition memorandum within 60 days of service of Defendant's motion to dismiss and Defendant shall serve any reply memoranda within 45 days after service of the lead plaintiff's opposition memorandum.

No motion to dismiss may be filed unless defendants comply with the Court's individual provisions.

DATED: May 30, 2007

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SAMUEL H. RUDMAN (SR-7957)  
DAVID A. ROSENFELD (DR-7564)  
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MARIO ALBA, JR.

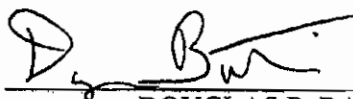
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*Attorneys for Plaintiff*

DATED: May 30, 2007

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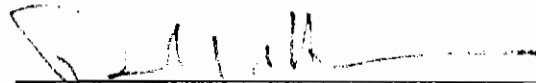
*Attorneys for Defendant*

\* \* \*

**ORDER**

IT IS SO ORDERED.

DATED: 6/6/07

  
\_\_\_\_\_  
THE HONORABLE RICHARD J. HOLWELL  
UNITED STATES DISTRICT JUDGE